



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:25-MC-00291-NCC
)	
ASSORTED JEWELRY, FURTHER)	
DESCRIBED IN ATTACHMENT A,)	
)	
Defendant.)	

MOTION TO EXTEND TIME TO FILE COMPLAINT FOR FORFEITURE

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Stephen Casey, Assistant United States Attorney for said District, and respectfully moves this Court to extend the time in which the United States is required to file a verified complaint for forfeiture and in support of its Motion states as follows:

1. On September 24, 2024, the following property (the “defendant property”) was seized from Jimmy Abraham Majeau during the course of a criminal investigation:
 - a. Stainless steel and custom diamond Audemars Piguet Royal Oak watch. 37mm case. Pave' diamond dial, SN: GA8921K;
 - b. Diamond and 14k (stamped) white gold bypass style bangle bracelet. (313) 1.5mm baguette diamonds;
 - c. Diamond and 14k (tested) white gold nail motif bracelet. 8 inches in diameter;
 - d. Diamond and 14k (tested) white gold bangle bracelet. 6.6mm wide. (12) 2.7mm;

- e. Diamond and 14k (tested) white gold cross pendant. 1 3/4 inches tall. (11)
3.5mm;
- f. Diamond and 14k (stamped) white gold tennis necklace. 17 inches long. (112)
3.5mm round diamonds;
- g. Stainless steel and custom diamond Cartier Santos Du Monde watch. 40mm
case, Swiss automatic caliber, SN: 169115BX;
- h. Diamond and 14k (stamped) white gold tennis necklace. 17 inches long. (133)
3.0mm round diamonds;
- i. Diamond and 14k (stamped) white gold tennis bracelet. 7 inches long. (36) 4.3
to 4.4mm round diamonds;
- j. 14K White Gold Solid Diamond Miami Cuban Link Bracelet measures 10mm
wide and 4.40mm deep;
- k. Diamond and 14k (stamped) white gold tennis bracelet. 6 1/2 inches long. (43)
2.5mm round diamonds;
- l. Diamond and 14k (stamped) white gold tennis bracelet. 6 3/4 inches long. (43)
2.7mm round diamonds;
- m. Diamond and 14k (stamped) yellow gold cross pendant. 2 1/2 inches tall;
- n. Pair of diamond and 18k (stamped) white gold stud earrings. 8.4 x 6.6mm;
- o. 18k and mother-of-pearl Van Cleef and Arpels Alhambra necklace;
- p. 18k (stamped) yellow gold and mother-of-pearl Van Cleef and Arpels five motif
Alhambra bracelet;
- q. Diamond and 14k (stamped) white gold tennis necklace. 17 inches long; and
- r. Diamond and 14k (tested) rose gold engagement ring. Center round brilliant
diamond.

2. All of the written notice of intent to forfeit required by Title 18, United States Code, Section 983(a)(1)(A) to be sent by the Drug Enforcement Administration to interested parties has been sent.

3. The time has expired for any person to file an administrative claim to the property under Title 18, United States Code, Section 983(a)(2)(A)-(E).

4. The only person to file an administrative claim to the defendant property with the Drug Enforcement Administration is Dianne Tiscareno on December 13, 2024.

5. Title 18, United States Code, Section 983(a)(3)(A) provides as follows:

Not later than 90 days after a claim has been filed, the Government shall file a complaint for forfeiture in the manner set forth in the Supplemental Rules for Certain Admiralty and Maritime Claims or return the property pending the filing of a complaint, except that a court in the district in which the complaint will be filed ***may extend the period for filing a complaint for good cause shown*** or upon agreement of the parties.

6. Title 18, United States Code, Section 983(a)(3)(B) also provides that the United States may maintain possession of the property by filing criminal charges within the relevant time frame.

7. Accordingly, absent an order extending its time, the United States must either file a civil complaint for forfeiture of the above-captioned property or file criminal charges on or about March 13, 2025.

8. The United States has an ongoing criminal investigation regarding the conduct giving rise to the forfeiture of the property. If a civil complaint is filed, any discovery in a civil case would impede the Government's ability to conduct its ongoing criminal investigation and would also create a burden on the claimant's right against self-incrimination. Should the property be returned to the claimant there would be no assurance that the property would be available as evidence in any subsequent court proceedings.

9. The requested extension is in the interest of justice insofar as it avoids the need for duplicative actions and thereby conserves judicial and other governmental resources.

10. A proposed order is included herewith for the Court's consideration.

WHEREFORE, for the foregoing good cause, the Government respectfully requests that the Court extend the period in which the United States is required to file a Complaint against the property and/or to return criminal charges until June 11, 2025.

Dated: March 4, 2025

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Stephen Casey

STEPHEN CASEY, #58879(MO)
Assistant United States Attorney
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CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2025, a copy of the foregoing was sent via first-class mail, postage prepaid and addressed to the following:

Dianne Tiscareno
16178 Eastridge Ct.
Chino Hills, CA 91709

Alex Andryuschenko
9440 Santa Monica Blvd., Suite 301
Beverly Hills, CA 90210

/s/ Stephen Casey

STEPHEN CASEY, #58879(MO)
Assistant United States Attorney

Attachment A

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8. Diamond and 14k (stamped) white gold tennis necklace. 17 inches long. (133) 3.0mm round diamonds;
9. Diamond and 14k (stamped) white gold tennis bracelet. 7 inches long. (36) 4.3 to 4.4mm round diamonds;
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15. 18k and mother-of-pearl Van Cleef and Arpels Alhambra necklace;
16. 18k (stamped) yellow gold and mother-of-pearl Van Cleef and Arpels five motif Alhambra bracelet;
17. Diamond and 14k (stamped) white gold tennis necklace. 17 inches long; and
18. Diamond and 14k (tested) rose gold engagement ring. Center round brilliant diamond.